To: Organizations operating video surveillance systems

From: Tracy Bigelow, Gaming Investigator

Re: New regulation for video surveillance review

Date: September 25, 2006

As you are aware, the revised North Dakota Games of Chance Administrative Rules (N.D.A.C.) are effective October 1, 2006. Included in the N.D.A.C. are changes to the requirements regarding video surveillance review. The previous regulation required a weekly review and documentation of one hour or one half hour of twenty-one/paddlewheel activity per table based on hours of operation.

The new regulation states, "on a <u>daily basis</u> an employee shall <u>review and document</u> that a surveillance camera at each twenty-one and paddlewheel table at a site is <u>recording an unobstructed view of the table activity</u>. If a recording unit or camera for a table is not properly operating or not producing an unobstructed view and clear picture of the cards, currency, or chips and is not repaired or remedied within seventy-two continuous hours, the organization shall close the table or limit wagers to two dollars on the table until the equipment is repaired."

Attached you will find two draft video surveillance review logs to assist you in documenting the review. The review should occur on each day of activity. SFN 58419 is to be used at sites that operate with a single table. This form is used for the entire quarter. SFN 58418 is to be used at sites that operate multiple tables. This form is used to document up to six tables at a site for an entire month. If an organization operates more than six tables at a site, a second log would need to be utilized for each month.

Items to consider when preparing the logs:

- 1. The preparer of the log should enter the organization's name and site in the space provided at the top of the log.
- 2. The date of activity should be entered in a month/date/year format.
- 3. For SFN 58418 only, the table number is to be entered in the space provided in each "Table #" box.
- 4. A check in the "Y" column indicates the equipment is recording an unobstructed and clear view of the face of the dealing shoe, all betting spaces, discard holder, chip tray, currency plunger, table number, site identification, cards, currency, chips, and tip cup.
- 5. A check in the "N" column indicates an unobstructed and clear view was not shown.
- 6. If an unobstructed and clear view was not shown, an explanation of the problem and the corrective action taken are to be documented in the space provided.
- 7. The initials of the reviewer indicate this review was completed.
- 8. The log must be retained for one year from the end of the quarter of the activity.

These forms are being disseminated as drafts to be used for the quarters ending December 31, 2006 and March 31, 2007. Please forward your feedback or suggestions on to me at tbigelow@nd.gov by January 31, 2007. We hope to have the forms finalized for use effective April 1, 2007.

Should you have any questions or concerns, please feel free to call me at 1-800-326-9240. Thank you.